

REMARKS

Status of the Claims

- Claims 1-15 are pending in the Application after entry of this amendment.
- Claims 1-15 are rejected by Examiner.
- Claims 1, 8, and 13 are amended by Applicant.

Claim Rejections Pursuant to 35 U.S.C. §103

Claims 1-6, 8-13, and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2002/047008 to Kallio in view of U.S. Patent No. 6,256,498 to Ludwig. Applicant respectfully traverses the rejection via amendment.

Independent Claims 1, 8, and 13 are amended to include the aspect that a communications with a WLAN occurs via communication with a Serving General Packet Radio Service Support Node (SGSN) of the selected PLMN. Support for this amendment can be found on page 7, lines 4-21 of the as-filed specification.

Kallio discusses the use of an A-interface Gateway (AGW) 310 to couple a WLAN to a Mobile Switching Center (MSC) 120 (Kallio, paragraph 028). One of skill in the art understands that an A-Interface is an interface that communicatively connects a Mobile Switching Center (MSC) 120 to a Base Station Subsystem (BSS) 110 of a cell within a GSM network 100. Thus, other cells, having other BSSs within the GSM network can also connect to the MSC 120. Kallio's contribution is the addition of a A-Interface Gateway (AGW) 310 to interconnect an MSC 120 to a WLAN as if the WLAN were another cell *within* the GSM network 100 (See Kallio, Figure 1 and paragraph 0035).

However, Kallio fails to teach or suggest a method to connect to a WLAN at a higher level in the 3G hierarchy. That is, Kallio teaches connection

at the MSC level; internal to a GSM network. Kallio discusses A-Interfaces that exist inside a single GSM network for connecting the MSC to the other cell BSSs *within the same network*. Kallio fails to teach or suggest a WLAN connection at a higher level in the 3G hierarchy. Kallio fails to teach or suggest a method to connect to a WLAN that exists in another GSM network.

Ludwig discusses an architecture that allows a first Public Mobile Land Network (PLMN) to talk to a second PLMN using a Gp interface. (Ludwig, col. 2, lines 7-29). However, Ludwig, like Kallio, does not teach or suggest a method to connect from a PLMN to a WLAN. Thus, Ludwig, like Kallio, fails to teach or suggest connection of a WLAN at a high level in the 3G hierarchy. Specifically, Ludwig fails to teach or suggest a connection between a WLAN and an SGSN where the WLAN appears as logical PLMN as recited in the pending claims.

Applicant respectfully submits that one of skill in the art recognizes that an A-Interface Gateway, like that of Kallio, is used internal to a single GSM network and is used to communicate with a MSC within a GSM system. Thus, Kallio does not disclose an interface with a WLAN at a higher level than the MSC which is internal to the GSM network. Although Ludwig discusses a higher level PLMN to PLMN communication, Ludwig does not teach or suggest connection of a WLAN at the high level of a PLMN in a 3G architecture.

Applicant respectfully submits that the combination of Kallio and Ludwig fails to teach or suggest to one of skill in the art that a WLAN can communicate with a high hierarchical level of a PLMN via a SGSN as recited in the pending claims because the combination teaches that a WLAN is connected at the lower hierarchical level of an MSC.

Thus, Applicant respectfully submits that the combination of Kallio and Ludwig fails to teach or suggest the aspect that a connection to a WLAN may be made via an SGSN of a PLMN as recited in the pending claims. Accordingly, Applicant respectfully requests reconsideration and withdrawal of

of the 35 U.S.C. §103 rejection of pending Claims 1-6, 8-13, and 15 because these amended claims patentably define over the cited art.

Claims 7 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2002/047008 to Kallio in view of U.S. Patent No. 6,256,498 to Ludwig, and in further view of U.S. Patent No. 6,212,390 to Rune. Applicant respectfully traverses the rejection.

The teachings of Kallio and Ludwig are discussed above.

Rune discusses dividing up a cellular mobile communications system into general geographic areas having geographic coordinates. However, like Kallio and Ludwig, Rune fails to teach or suggest that a WLAN connection may be made via a SGSN of a PLMN as recited in amended independent Claims 1 and 13 upon which Claims 7 and 14 depend respectively. Since independent Claims 1 and 13 are patentably distinct over the cited art, then dependent Claims 7 and 14 are likewise patentably distinct over the cited art per MPEP §2143.03. Applicant respectfully requests reconsideration and withdrawal of the 35 U.S.C. §103 rejection of pending Claims 7 and 14.

Conclusion

Applicant respectfully submits that the amended pending claims patentably define over the cited art and respectfully requests reconsideration and withdrawal of all rejections of the pending claims. Applicant respectfully solicits reconsideration for a Notice of Allowance for all pending claims.

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If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 07-0832 therefore.

Respectfully submitted,
Shaily Verma, et al.

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